

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PRECISION ASSOCIATES, INC., <i>et al.</i> , Plaintiffs, v. PANALPINA WORLD TRANSPORT (HOLDING) LTD., <i>et al.</i> Defendants.	CASE NO. 08-CV-00042 (JG)(VVP)
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**DECLARATION OF W. JOSEPH BRUCKNER IN SUPPORT OF PLAINTIFFS’
PETITION FOR REIMBURSEMENT OF CERTAIN EXPENSES ON BEHALF OF
LOCKRIDGE GRINDAL NAUEN P.L.L.P.**

I, W. Joseph Bruckner, declare and state as follows:

1. I am a partner at the law firm of Lockridge Grindal Nauen P.L.L.P. I submit this Declaration in support of Plaintiffs’ petition for reimbursement of certain costs and expenses in connection with services rendered in connection with this litigation since the last petition for reimbursement of cost and expenses made in July 2016.
2. My firm is this Court’s appointed co-lead counsel to Plaintiffs and the Plaintiff class in this action. As detailed in Exhibit 1, my firm has incurred a total of \$32,656.99 in unreimbursed expenses during the period August 1, 2016 through the present.
3. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.
4. As plaintiffs’ co-lead counsel, my firm and I have co-led this litigation from its inception through today. For purposes of this petition, during the period August 1, 2016 through

the present, my firm has been extensively involved in the administration of claims in this case, as well as other activities, including the following. We also incurred expenses as a result of these activities:

- Researched, drafted and finalized motions and related papers for final approval of settlements;
- Attended fairness hearings and presented arguments in support of final approval of settlements and related motions;
- Researched and drafted the plan of allocation regarding settlement funds;
- Researched, analyzed and resolved issues regarding claims forms;
- Researched, analyzed and resolved claims administration issues and requirements for distributions;
- Coordinated, monitored and verified status of specific defendant settlement payments;
- Researched and prepared argument in support of settlement notice program;
- Researched and monitored status of settlement objections and requests for exclusions;
- Researched and drafted motion in support of settlement distribution;
- Drafted and finalized updates for settlement website information;
- Coordinated with claims administrator information for settlement website;
- Researched, analyzed and audited settlement claims and objections;
- Coordinated with claims administrator protocols and processes for auditing claims, addressing claim defects, and addressing claimant concerns and responses;

- Negotiated with claims administrator issues regarding claims administration, auditing and billing issues;
- Researched and analyzed documents and data for claims audits and for responses to claimants;
- Drafted correspondence forms to claimants regarding explanation of claim audit, response to audit objections, and distribution status;
- Coordinated with claims administrator to finalize and transmit response correspondence to claimants;
- Responded to claimant telephone inquiries, questions and concerns regarding claims status and audits;
- Drafted, finalize and filed with the Court status reports regarding claims administration;
- Researched, analyzed and evaluated claims by objectors, including the China Chamber of International Commerce (“CCOIC”);
- Researched and analyzed Chinese law regarding CCOIC claim;
- Coordinated with Chinese counsel regarding CCOIC claim;
- Communicated and negotiated with counsel for CCOIC regarding auditing of claim and resolution of claim dispute;
- Participated in mediation in court of appeals to resolve CCOIC claim issues;
- Drafted mediation statement regarding CCOIC claim;
- Drafted and finalized appellate papers in response to CCOIC appeal of claim issues;
- Negotiated settlement of CCOIC claim;

- Researched, drafted and finalized settlement agreement regarding CCOIC claim;
- Researched and filed motion for Court approval of settlement agreement regarding CCOIC claim;
- Calculated and finalized distributions from settlement funds; and
- Coordinated with escrow agent regarding distributions from settlement funds.

All of these expenses were necessarily incurred in our prosecution of this litigation and our administration of claims by qualified class members, including the resolution of the objection and subsequent appeal by the CCOIC. My firm maintains records supporting all of these expenses, which can be produced to the Court on request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 15th day of July 2020 at Minneapolis, Minnesota.

/s/ W. Joseph Bruckner
W. Joseph Bruckner

EXHIBIT 1

Precision Associates, Inc., et al., v. Panalpina World Transport (Holding) Ltd., et al.
Eastern District of New York Case No. 1:08-cv-00042-JG-VVP

Exhibit 1 - Summary of Expenses

Firm Name: Lockridge Grindal Nauen P.L.L.P.

Time Period: August 1, 2016 through April 28, 2020

**(does not include expenses submitted in
the previously filed interim fee petitions)**

Type of Expense	Cumulative Total
Assessments to Common Cost Litigation Fund	\$3,700.00
Commercial Copies	
Internal Reproduction / Copies	\$324.60
Court Costs & Filing Fees	\$271.00
Court Reporters & Transcripts	\$22.50
Computer Research	\$1,503.17
Telephone & Fax	\$322.67
Postage / Express Delivery / Messenger	\$414.17
Professional Fees (expert, investigator, accountant, etc.)	\$11,425.00
Witness / Service Fees	
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	\$14,280.71
Clerical Overtime	
Miscellaneous: (Meetings Foods & Beverage Expense)	\$393.17
TOTAL EXPENSES	\$32,656.99